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9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA
11 SACRAMENTO DIVISION
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14 KRISTY LYNN PRYOR,

15 Plaintiff,

16 v.

17 KILOLO KIJAKAZI,
18 Acting Commissioner of Social Security,

19 Defendant.
20
21

No. 2:22-cv-00610-CKD

**STIPULATION FOR AN EXTENSION OF
TIME; ORDER**

22 With the Court's approval, IT IS HEREBY STIPULATED, by and between the parties,
23 through their respective counsel of record, that the time for Defendant to respond to the complaint
24 filed in the above-captioned matter be extended by fourteen (14) days from September 5, 2022,
25 up to and including September 19, 2022. This is the parties' third request for an extension.

26 Defendant respectfully requests that the Court find good cause because the undersigned
27 attorney was recently reassigned to this case and requires more time to investigate the facts
28

1 alleged in the complaint and respond to this mandamus action. The undersigned attorney is
2 currently exploring the claims raised to determine whether any can be resolved at this stage. In
3 addition, prior to being reassigned to this case, the undersigned attorney had scheduled to be out
4 of the office at the time of the current deadline. Furthermore, the undersigned attorney has six
5 district court briefs due during the next three weeks, in addition to the current deadline to respond
6 to Plaintiff's complaint in this case. Defendant apologizes to the Court for any inconvenience
7 caused by this delay.

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9 Respectfully submitted,

10 DATE: August 31, 2022

/s/ John V. Johnson*
JOHN V. JOHNSON
Attorney for Plaintiff
(*as approved via email)

13 PHILLIP A. TALBERT
United States Attorney
14 PETER THOMPSON
Acting Regional Chief Counsel, Region IX
15 Social Security Administration

16 DATE: August 31, 2022

By /s/ Elizabeth Landgraf
ELIZABETH LANDGRAF
Special Assistant United States Attorney
18 Attorneys for Defendant

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20 **ORDER**

21 Pursuant to the parties' Stipulation, and for good cause shown, IT IS SO ORDERED
22 that Defendant shall have an extension of 14 days, to September 19, 2022, to respond to the
23 complaint.

24 Dated: September 2, 2022



CAROLYN K. DELANEY
26 UNITED STATES MAGISTRATE JUDGE
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